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SEP 26 2022  
CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

EXPERT DISCLOSURE AFFIDAVIT  
BY TANZID SHAMS, M.D.

STATE OF TENNESSEE

COUNTY OF WASHINGTON

I, Tanzid Shams, M.D., first duly sworn according to law, do hereby depose and state as follows:

- 1) My name is Tanzid Shams and I am of sound mind, lawful age, and in all other respects competent to make this Affidavit.
- 2) I am licensed to practice medicine by the State Medical Board of Tennessee. I am a board certified neurologist. I am a Clinical Associate Professor of Neurology, Quillen College of Medicine. I am the Director of Neurology, Johnson City Medical Center, Johnson City, Tennessee.
- 3) I devote more than half of my professional time to the active clinical practice of medicine in my field of licensure or to its instruction at an accredited school.
- 4) I have reviewed the medical records reasonably available to the Plaintiff concerning the allegations contained in the complaint.
- 5) I am familiar with the applicable standard of care relative to the allegations contained in the complaint.
- 6) It is my opinion that since the Plaintiff was discovered to have cervical spinal cord impingement, accompanied by loss of right arm strength, the cervical disectomy procedure should have been conducted within a week. The main reason for this is that if cervical bones cause further impingement on the nerves, it can cause severe, irreversible damages, including long-term loss of arm and hand function, as well as loss of sensation of the arm and hand, which appears to have occurred according to the records.
- 7) It is my opinion that the Defendants named in the Complaint, including the Bureau of Prisons, Thomas Mayer, M.D., and Jared Broadway, M.D., breached the standard of care by failing to provide proper medical treatment to the Plaintiff relative to the allegations contained in the Complaint.
- 8) The aforementioned breach of the standard of care caused severe injury to the Plaintiff.

/s/ Mario T. Mancini  
Mario Ferbo Mancini 9/21/2022

Further Affidavit Signed Not.  
/s/ Tanzid Shams  
Tanzid Shams, M.D.

Sworn to before me and subscribed in my presence this 12 day of JULY, 2022.

/s/ Janette Johnson  
Notary Public

